

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-CR-80144-RS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOFF STENN WROY PHILOSSAINT,

Defendant.

_____ /

DEFENDANT PHILOSSAINT'S UNOPPOSED MOTION
TO CONTINUE SENTENCING HEARING

The Defendant, JOFF STENN WROY PHILOSSAINT, through undersigned counsel, moves this Court to continue the sentencing hearing currently set for Wednesday, April 19, 2023, and in support thereof, states the following:

1. Defendant has pled guilty or has been convicted by a jury, of conspiracy to commit wire fraud, two counts of conspiracy to commit money laundering, and one count of obtaining citizenship by fraud.

2. On March 16, 2023, counsel was appointed pursuant to the Criminal Justice Act (CJA) as Defendant's new attorney to represent Defendant for purpose of sentencing. Counsel has met with Defendant's prior attorney and Defendant, has reviewed the Presentence Investigation Report, and has spoken with the Prosecutor, Marc Osborne.

3. Based on the above conversations, it is clear this is a procedurally and substantively complex case. There are 33 funded loans in question. Discovery is voluminous. Counsel needs to determine the correct and proper objections to file regarding the Presentence Investigation Report. Counsel also needs to spend additional time becoming familiar with the case.

4. Counsel has conferred with Assistant United States Attorney, Marc Osborne, who agrees that a continuance is appropriate in light of the complexity of the case.

5. Accordingly, Defendant moves for a 60-day continuance of Defendant's sentencing hearing to a date at the end of June, 2023, or thereafter. This will allow sufficient time to file the necessary responsive pleadings to complete the sentencing process.

WHEREFORE, Defendant respectfully moves the Court to continue the sentencing hearing as requested herein.

Respectfully Submitted,

SCOTT W. SAKIN, P.A.
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By: /s/ Scott W. Sakin
SCOTT W. SAKIN, ESQ.
Fla. Bar No. 349089

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing DEFENDANT PHILOSSAINT'S UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING was filed electronically with the Clerk of the Court through the CM/ECF system and copies of same distributed to all counsel of record and known interested parties on this 4th day of April, 2023.

By: /s Scott W. Sakin
SCOTT W. SAKIN, ESQ.
Fla. Bar No. 349089